

A47 Blofield to North Burlingham Dualling

Scheme Number: TR010040

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9.11 Applicant's Response to Broadland District Council's Local Impact Report

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**The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulations 2009**

A47 Blofield to North Burlingham Dualling
Development Consent Order 202[x]

**APPLICANT'S RESPONSE TO
BROADLAND DISTRICT COUNCIL'S LOCAL IMPACT REPORT**

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1 INTRODUCTION

- 1.1.1 The Development Consent Order (DCO) application for the A47 Blofield to North Burlingham scheme was submitted on 30 December 2020 and accepted for examination on 27 January 2021.
- 1.1.2 The purpose of this document is to set out Highways England's (the Applicant) response to the Broadland District Council's Local Impact Report (LIR) (**REP1-066**).

2 RESPONSE TO LOCAL IMPACT REPORT

Reference	Local Impact Report	Applicant's Response
1	<p><u>Introduction</u></p> <p>This Local Impact Report (LIR) has been prepared by Broadland District Council in accordance with the advice and requirements set out in the Planning Act 2008 (as amended) as, 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.</p>	No response required
2	<p>In preparing this LIR the local authority has had regard to the DCLG's Guidance for the examination of applications for development consent (2015) and the Planning Inspectorate's Advice Note One, Local Impact Reports (2012).</p>	No response required
3	<p><u>Details of the proposal</u></p> <p>The scheme proposes to upgrade a section of the A47 from single carriageway to dual carriageway between the villages of Blofield and North Burlingham. The scheme will largely be constructed to the south of the existing carriageway and will pass predominantly through open agricultural land/countryside within proximity of a number of existing buildings, including residential dwellings, along the route.</p>	No response required
4	<p>Alterations will be undertaken at the western end of the scheme to the existing junction with Yarmouth Road through the closure of a central reservation and prohibition of right hand turns from Yarmouth Road east onto the A47. Left hand turns from Yarmouth road west onto the A47 will be retained but alterations made to allow vehicles to gain more speed before joining the A47.</p>	No response required
5	<p>At the eastern end of the scheme the existing junctions with the B1140 will be changed from at grade to grade separated with slip roads eastbound and westbound and allow traffic heading north-south and south-north to avoid the need to cross multiple lanes of traffic.</p>	No response required

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6	The scheme is entirely within the administrative area of Broadland District Council. The scheme passes through the parishes of Blofield, Lingwood and Burlingham, Beighton (incorporating Moulton St Mary) and Acle.	No response required
7	<p><u>Relevant Development Proposals</u></p> <p>There are no other planning applications or other proposals in the district which are directly relevant to the proposal.</p>	No response required
8	<p><u>Policy Framework</u></p> <p>The Development Plan comprises the following documents:</p> <ul style="list-style-type: none"> • Joint Core Strategy for Broadland, Norwich and South Norfolk 2011 (amendments adopted 2014) (JCS) • Broadland Development Management DPD 2015 (DM DPD) • Broadland District Council Growth Triangle Area Action Plan 2016 (GT AAP) • Site Allocations DPD 2016 (SA DPD) • Acle Neighbourhood Plan (2015) • Blofield Neighbourhood Plan (2016) <p>Also relevant is the Broadland Landscape Character Assessment SPD 2013</p>	<p>With the exception of the Acle Neighbourhood Plan these Development Plan policy documents are referred to in the Case for the Scheme (REP1-042).</p> <p>With regards to Acle Neighbourhood Plan, the only policy relevant to the Scheme is Policy 5 – Improving links to the countryside and surrounding villages. This states that provision of new and improved footpaths, footways, cycleways and bridleways connecting Acle with surrounding villages and the countryside will be encouraged. Neither of the priority schemes identified in the Plan are of relevance to the A47 Blofield to North Burlingham Scheme.</p> <p>The Scheme includes facilities that improve amenities for cyclists and pedestrians, including. A footpath/cycleway crossing at the B1140 Overbridge forms part of the Scheme. The Burlingham Trails Network currently links from Lingwood Road, eastwards to connect with a proposed footway from Lingwood Lane to the Acle junction where it connects into a shared footway/cycleway crossing of the A47, which is also part of the Scheme. This is illustrated in Figure 7-13 of the Transport Assessment (REP1-45).</p> <p>Further information is provided in ES Chapter 12 Population and Human Health (REP1-030) and Appendix A to the Applicant's Response to Relevant Representations (REP1-060).</p> <p>The Broadland Landscape Character Assessment SPD 2013 is referred to in ES Chapter 7 Landscape and Visual (APP-045).</p>

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9	<p>The following policies are considered to be particularly relevant to the proposals:</p> <p><u>JCS</u></p> <ul style="list-style-type: none"> • Policy 1 – Addressing climate change and protecting environmental assets • Policy 2 – Promoting good design • Policy 5 – The economy • Policy 6 – Access and transportation • Policy 7 – Supporting communities <p><u>DM DPD</u></p> <ul style="list-style-type: none"> • Policy GC1 – Presumption in favour of sustainable development • Policy GC2 – Location of new development • Policy GC4 – Design • Policy EN1 – Biodiversity and habitats • Policy EN2 – Landscape • Policy EN4 – Pollution • Policy TS2 – Travel plans and transport assessments • Policy TS3 – Highway safety • Policy CSU5 – Surface water drainage <p><u>GT AAP</u></p> <ul style="list-style-type: none"> • No directly relevant policies <p><u>SA DPD</u></p> <ul style="list-style-type: none"> • No directly relevant policies <p><u>Acle Neighbourhood Plan</u></p> <ul style="list-style-type: none"> • Policy 5 – Improving links to the countryside and surrounding villages <p><u>Blofield Neighbourhood Plan</u></p> <ul style="list-style-type: none"> • No directly relevant policies 	<p>Appendix D of the Applicant's Response to The Examiner's First Written Questions (ExQ1) (REP1-061) provides a list of relevant development plan policies and the reasons for conformity or otherwise with these, with the exception of DM DPD Policy GC2, outlined below.</p> <p>Policy GC2 states that new development will be accommodated within the settlement limits defined on the policies map, outside of these limits development which does not result in any significant adverse impact will be permitted where it accords with the specific allocation policy of the development plan. The Scheme is a Nationally Significant Infrastructure Project and as a road scheme the allocated development types shown on the policies map and settlement limits are not applicable.</p> <p>With regards to Acle Neighbourhood Plan, Policy 5 – Improving links to the countryside and surrounding villages, the Scheme's accordance with this policy is summarised in under section 8 above.</p>

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10	Other material considerations include the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).	<p>The compliance of the Scheme with national policy is summarised in the Case for the Scheme (REP1-042).</p> <p>As the Scheme is a Nationally Significant Infrastructure Project, the National Policy Statement for National Networks takes priority (NNNPS). Accordance with the NNNPS is set out in the National Networks National Policy Statement Accordance Tables (APP-121).</p>
11	Also of relevance is the emerging Greater Norwich Local Plan (GNLP) The Plan which covers BDC, Norwich City and South Norfolk Councils is being prepared. The Regulation 19 consultation closed on 22nd March 2021 and is due to be submitted to the Secretary of State for Examination anticipated to be undertaken between November and December 2021. It is expected that the GNLP would be adopted in Autumn 2022. However, given the stage of preparation it carries only very limited weight in decision making.	The Greater Norwich Local Plan is summarised in the Case for the Scheme (REP1-042) (paragraphs 6.4.21 – 6.4.24).
12	A statement of compliance or otherwise with the above development plan policies is provided as appendix 1 to the LIR.	See Appendix 1 for response.
13	<p><u>Impacts of the Proposal</u></p> <p>The current route of the A47 between Blofield and North Burlingham results in frequent delays and high levels of slow moving traffic particularly, but not limited, to peak hours due to the single width of the existing carriageway. With planned growth within the existing and emerging Development Plan it is anticipated that these issues would be exacerbated due to the increase in vehicular traffic using the strategic highway network.</p>	No response required

Reference	Local Impact Report	Applicant's Response
14	<p>The Council strongly supports the principle of the proposed scheme on the basis of the potential economic benefits which may result. These benefits, in combination with the wider programme of A47 improvements being proposed by Highways England (and as listed in the Council's Relevant Representation), are considered to include:</p> <ul style="list-style-type: none"> • help to boost the economic prosperity of a large part of the East of England and contribute to national economic growth. • Shorter and more reliable journey times along the road and onwards to the Midlands. • Reduce delay, congestion and inefficiency. • Attracting more customers for businesses and attracting new businesses. • Supporting existing businesses to grow and become more productive and profitable. • Allowing businesses to invest with confidence. • Encouraging more visitors to the region. • Creating more jobs. 	No response required
15	The importance of these economic benefits are increased in the light of the COVID19 pandemic and the need to support the economy as part of the post pandemic recovery.	No response required
16	<p>The importance of this scheme is reflected in the existing development plan. Policy 6 of the JCS seeks to enhance the transport system in order to develop the role of Norwich as a Regional Transport Node. This is to be achieved by, amongst other things, "promoting improvements to the A47". The need to deliver improvements to the strategic highway network is echoed in the emerging GNLP, which supports strategic infrastructure improvements that support the growth needs of the area. The emerging GNLP, in Policy 4 (Strategic Infrastructure), specifically refers to improvements to the A47 between Blofield to North Burlingham as one of the schemes that will help the plan achieve its aims.</p>	<p>The JCS policies are also outlined in the Case for the Scheme (REP1-042) and the Scheme's compliance with the JCS is summarised in Appendix D of the Applicant's Response to The Examiner's First Written Questions (ExQ1) (REP1-061).</p> <p>As noted above the Case for the Scheme (REP1-042) (Section 11) acknowledges the emerging Greater Norwich Local Plan.</p> <p>The Applicant acknowledges that within the emerging GNLP Policy 4 is supportive of the Scheme.</p>

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17	<p>Consequently, the Council consider that there are significant economic benefits associated with the scheme and are supportive of the proposals in principle. The Council would however like to take this opportunity to highlight the following matters to the Examining Authority:</p>	<p>No response required</p>
18	<p><u>Heritage</u></p> <p>In accordance with paragraph 193 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. In accordance with paragraph 197 of the NPPF the effect of an application on the significance of non-designated heritage assets also needs to be taken into account in determining the application.</p>	<p>Effects on the significance on both designated and non-designated heritage assets have been assessed as set out in the methodology presented in ES Chapter 6, Cultural Heritage, Section 6.4 (previously REP1-022, resubmitted at Deadline 3 (TR010040/APP/6.1 Rev 1)).</p>
19	<p>Broadland District Council is satisfied that through the assessment of the Zone of Visual Influence (ZVI) and Zone of Theoretical Visibility (ZTV), as well as assessment of potential noise impact, potential heritage assets affected have been covered, and this includes identification of non-designated heritage assets. Generally the Council would have more concerns with regard to long term and operational impacts rather than temporary impacts from construction, as (apart from road sign and milepost) assets will not be directly physically impacted upon and construction impact is temporary. It is however good to see that Poplars Farm buildings will be monitored for vibration damage etc from construction however the Council is surprised that this is not also the case with nearby Oaklands.</p>	<p>The Applicant notes that BDC is satisfied with these assessments.</p> <p>The assessment of operational impact has been included for all chapters in the ES as per the Scoping Opinion (APP-116).</p> <p>Vibration risk assessments undertaken to date for the construction phase (see ES Chapter 11: Noise and vibration (REP1-028)) have not indicated a risk to either of the buildings identified by BDC.</p> <p>The precautionary approach to Poplar Farm was taken in respect of the location, condition and multiple building phases/repairs of the northern-most barn. Only the barn is proposed for monitoring. This reasoning is provided in ES Chapter 6, Cultural Heritage Table 6.2 (previously REP1-022, resubmitted at Deadline 3 (TR010040/APP/6.1 Rev 2)).</p> <p>Oaklands is further away from sources of potential vibration and the building is in much better condition. Given that there is no established vibration risk and the conditions that gave rise to the precautionary approach at the Poplars Farm barn are absent, the building is are not</p>

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		proposed for monitoring on a precautionary basis.
20	With regard to heritage, the Environmental Statement is considered to be comprehensive and reasonable in its assumptions, and a positive approach in terms of seeking appropriate levels of mitigation where required to reduce the level of harm where possible. It is however noted that even with mitigation there are assets where there will be slight adverse impact.	No response required
21	Due to the urbanising affect, there is also negligible to potentially slight adverse impact on the two historic churches, Owl Barn and house next to Owl Barn – although this is mainly due to their higher significance and the relatively very low impact in terms of setting the analysis comes out as higher impact in the matrix than for example non-designated heritage assets which are considered to be of lower heritage value and significance.	<p>It has been assumed that the two churches referred to are the Church of St Andrew (1051522, MNF8523) and the Church of St Peter (1304547, MNF8524).</p> <p>Effects before mitigation on the Churches are presented in ES Appendix 6.1, Cultural Heritage Information, Table 5 (APP-074). This acknowledges possible new structures being visible in some circumstances before mitigation and assesses the effects as neutral given the current urbanising effect from the existing A47, balanced with the increased distance of the proposed carriageway. In ES Chapter 6, Cultural Heritage, Table 6.2 (previously REP1-022, resubmitted at Deadline 3 (TR010040/APP/6.1 Rev 2)), with mitigation, the effect is assessed as beneficial overall.</p> <p>The urbanising effect on Owls Barn and House at Owls Barn (1304603, MNF51094 and 1372653, MNF51115) before mitigation is also given in ES Appendix 6.1, Table 5 (APP-074). This assesses a negligible adverse effect, deriving from potential visibility of vehicles and their headlights, as well as road noise.</p>
22	In terms of permanent impact on the setting of heritage assets the most affected assets in terms of setting will be the non-designated heritage assets of Poplar Farm and Oaklands (former Rectory to St Andrew) which will be in very close proximity to the new road. In the categorising used in the Cultural Heritage chapter (APP-044) (para 6.4.14) non-designated heritage assets have relatively low value in terms of significance, and therefore overall significance of effect usually comes out quite low even if there does appear to be quite a significant degree of adverse harm to the setting when assessing the setting. This is the case with Poplars Farm where major adverse impact (reduced to moderate with mitigation) is	<p>The Applicant agrees and acknowledges that it is a known limitation of the matrix assessment approach. The methodology presented in ES Chapter 6, Cultural Heritage, Section 6.4 (previously REP1-022, resubmitted at Deadline 3 (TR010040/APP/6.1 Rev 1)) to apply that matrix approach to cultural heritage assets allows for adjustment by professional judgement in consideration of the nuanced narrative of value/sensitivity and effects.</p> <p>The error in the table has been corrected and ES Chapter 6 Cultural Heritage (previously REP1-022) has been submitted at Deadline 3</p>

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	<p>identified and Oaklands where there is moderate harm, and where the bypass is directly to the north. It is worth noting that moderate is only second to major in the possible degrees of impact in the report i.e. no change, negligible, minor, moderate or major (para 6.4.15). There is an error on the table on p28 (Row 2) of APP-044 where presumably it is meant to have The Old Post Office to the left column and low in value/sensitivity column to the right. For Beighton House the impact is identified as being negligible to possibly at worse slight adverse, whereas the Old Post Office it is considered slight beneficial as the dual carriageway will be further away.</p>	<p>(TR010040/APP/6.1 Rev 2).</p>
23	<p>In terms of impact the proximity of the road will increase impact on Poplars Farm and loss of rural context, however there are numerous barns to the north and the principal elevation of the farmhouse is facing south. Mitigation is proposed in terms of increased vegetation as screening. Similar, Oaklands will be disconnected from its church which it was the rectory for, however the existing road already severed connection to some extent being such a busy thoroughfare, and there is plenty of documentary heritage to show the link. Also, it now has a relatively enclosed setting with high hedges around it and is not particular open to surrounding views. Beighton House will be less affected as it already fronts towards a dual carriageway, but the junction will have the effect of further urbanising the setting, whereas the setting of the Old Post Office should improve with the road being further away, so the scheme would be considered beneficial.</p>	<p>No response required</p>
24	<p>The Council consider that it is good to see the milestones identified and protected (confirmed in Row 1 page 25 of APP-044), and the intention to conserve these in situ, which is important as their positioning is part of their significance in terms of indicating distances between towns along the road. It is proposed for the guidepost to be refurbished and relocated (Row 1 page 26 of APP-044) which is acceptable as it position should reflect route marking and it would lose it sense and meaning if kept in its existing position. These are most at risk of harm during the construction phase so it is welcome that appropriate measures are being undertaken to ensure they are preserved, and indeed enhanced through conservation/restoration.</p>	<p>No response required</p>
25	<p>The former parkland to Burlingham Hall is identified as non-designated heritage asset, and a small part of the former parkland to the south east</p>	<p>The historic map does clip the northern boundary of the park (MNF61984). However, the full extent of the park was transcribed into GIS by the</p>

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	<p>will be developed upon altering the boundary definition of the former extent of the park. It is noted that this has already been altered in terms of character with loss of the corner plantation and the subdivision of the land with new field divisions. The map in the appendix does not however show the full extent of historic park as it was at the turn of the century, although it is described in para 6.7.26-28 of APP-044 as being to that extent in manner – which is a bit confusing – map should show full extent of historic park or it could indicate the former area of park now which has now lost its character.</p>	<p>Norfolk historic environment record and is shown on ES Figure 6.2, Sheet 2 (APP-056).</p> <p>The Applicant acknowledges that the figure is crowded. A new figure (ES Figure 6.6) will be provided at Deadline 4 to make the information clearer.</p>
26	<p>In terms of the listed assets, Owl Barn and the house at Owls Barn are not greatly affected and the setting of the two churches will be improved with the road being further away and planting which will reduce noise. Permanent impact is therefore negligible to slight adverse due to the general urbanising affect (para 6.8.12 of APP-044)</p>	No response required
27	<p><u>Social</u></p> <p>Whilst the proposal has the potential for economic benefits, which in turn are likely to have positive social impacts, the Council have identified in their Relevant Representation the potential impact on routes for walking, cycling and horse riding.</p>	No response required
28	<p>The A47 acts as a constraint to north-south movement by non motorised users. Within the locality of the scheme are a series of public rights of way and permissive paths which provide access to the countryside for informal recreation.</p>	No response required
29	<p>Burlingham Woodland Walks, have been developed on land owned by Norfolk County Council since the 1990s and pass through a landscape of old and new woodland and orchards and farmland interspersed by hedgerows within and around North and South Burlingham, Lingwood, Strumpshaw, Beighton and Acle. These walks can be accessed by residents of Lingwood (south of the A47) by crossing the A47 using Burlingham FP3. The proposed scheme would sever Burlingham FP3 and instead redirect users east towards the proposed B1140 crossing.</p>	<p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the results, which supports the Applicant's conclusion, is set out in Appendix A to the Applicants Response to the Relevant Representations (REP1-060).</p> <p>The Scheme includes the provision of the North Burlingham Junction, which incorporates pedestrian and cyclist facilities to facilitate safe north south movements across the A47 thereby reducing the severance effect.</p>

Reference	Local Impact Report	Applicant's Response
		<p>The Applicant considers that the North Burlingham Junction is located in the right place to both provide for connectivity and remove a difficult existing junction.</p> <p>Although Burlingham FP3 will be diverted, a new public footpath running east west and to the south of the new A47 alignment will provide onward connections to pedestrian and cyclist facilities provided at both the Blofield Overbridge and the North Burlingham Junction. These facilities will provide for the safe north south crossing movements across the A47 thereby reducing the severance effect. The Applicant's assessment indicates that Burlingham FP3 is used primarily for recreational walking trips and is not a practical route for utility walking trips due to the quality of the footpath and the walking distances between North Burlingham and local facilities and amenities in Lingwood. The additional walking distances required to access the crossing facilities at the North Burlingham Junction from Burlingham FP3 are unlikely to deter recreational trip makers.</p>
30	<p>Burlingham Woodland Walks are a County Council initiative which is supported by Broadland District Council. Access to high quality green infrastructure supports growth in the district by providing an alternative to visiting the Broads thereby reducing pressure on European and International sites. Consequently the District Council are highly supportive of ensuring easy access by local residents to green infrastructure.</p>	No response required
31	<p>To support the delivery of green infrastructure in the District in the short, medium and long term, Broadland District Council has had prepared, on its behalf, the East Broadland Green Infrastructure Project Plan (See appendix 2 of the LIR). The plan is intended to support the future growth of the region by proposing green infrastructure projects with the capacity to accommodate future developments. Project 5 of the plan "A47 Safe Foot and Cycling Crossing" seeks to deliver a safe foot and cycle crossing over the A47 between Lingwood and North Burlingham. This will provide a vital link between the settlements and the Burlingham Trails to the north and south of the A47. The project plan identifies that the A47 dualling plans would increase the severance of the A47 and that a new crossing would provide a way to integrate communities on both sides of the road</p>	<p>The East Broadland Green Infrastructure Project Plan is not a policy document and instead supports the delivery of potential green infrastructure projects. The reasons why Project 5 of the Plan (a footbridge crossing over the A47) is not included within the Scheme are summarised below and in Appendix A to the Applicants Response to Relevant Representations (REP1-060).</p> <p>The Applicant considers that the overall package of Walking, Cycling and Horse-Riding is appropriate and the two overbridges crossing the realigned A47 provide appropriate crossings to meet the needs of such users. The Applicant has undertaken a survey and an analysis of the</p>

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		<p>results, which supports the Applicant's conclusion, is set out in Appendix A to the Applicants Response to Relevant Representations (REP1-060).</p> <p>The WCH survey results suggest that the cycle track over the proposed B1140 Overbridge would remove the existing severance effect of the existing A47 for the majority of non-motorised users.</p> <p>The B1140 Overbridge also provides a reasonable alternative route for cyclists and the single pedestrian crossing at Lingwood Lane. Importantly, Lingwood Lane is equidistant between the overbridge (identified as Project 5 in the East Broadland Green Infrastructure Project Plan) and the B1140 Overbridge, and is therefore likely to provide an equally convenient diversion.</p> <p>At Lingwood Road/Dell Corner Lane the survey did not reveal any pedestrians crossing of the A47. The cyclists using Lingwood Road would be expected to divert across the Blofield Overbridge.</p> <p>Burlingham FP3 is only a right of way for those on foot and it does not therefore provide a legitimate crossing point for cycles. Given the sizeable walking distances and walking times involved and the fact that part of the route is via an un-surfaced, part field edge/part field footpath, it is concluded that Burlingham FP3 is not a practical route for everyday utility trips on foot between North Burlingham and Lingwood. This would continue to be the case if an overbridge of the A47 at North Burlingham were to be provided. Therefore, it is unlikely that provision of such an overbridge would lead to a significant increase in utility walking trips between Lingwood and North Burlingham.</p> <p>With the Scheme implemented as proposed in the application, users undertaking recreational walking trips would experience increases in walking time and walking distance when accessing the Burlingham Woodlands Walks network from Lingwood. However, the increased walking distances are unlikely to be a deterrent to recreational users and the creation of additional lengths of footpath can be seen to provide additional walking opportunities for them.</p>

Reference	Local Impact Report	Applicant's Response
		It is therefore not possible to justify an additional overbridge at North Burlingham for pedestrians and cyclists.
32	The Project Plan identifies the opportunities that the crossing would provide which include an enhancement of the Burlingham Trails network increasing enjoyment for residents with the potential to form a new green corridor.	No response required
33	As identified by the Council previously, the proposed scheme severs Burlingham FP3 and redirects users to the proposed B1140 crossing. Whilst the inclusion of walking and cycling facilities at this junction is welcomed, the severance of Burlingham FP3 results in a significant detour which could be avoided through the inclusion of a footbridge across the proposed A47. If delivered as a green bridge there would be additional ecological connectivity, also supported by Project 5 of the East Broadland Green Infrastructure Project Plan	See response to Section 31 above.
34	The Council note that this is an issue raised by Norfolk County Council, Lingwood Parish Council and Strumphaw Parish Council in their Relevant Representations (RR-002, RR-05 and RR-06) and Broadland District Council are supportive of their views on this issue.	The Applicant has provided a response to these representations in the Applicants Response to Relevant Representations (REP1-060) submitted at Deadline 1.
35	Broadland District Council has also previously made comments about the potential for the inclusion of cycling and pedestrian routes between North Burlingham and Acle. Whilst it is noted that Highways England have identified that these are outside of the scope of the scheme, Broadland District Council would wish to reiterate that their inclusion would be welcomed on the basis that it would create sustainable access for those in North Burlingham to a greater range of shops and services in Acle, and provide enhanced access for residents in the locality to access Burlingham Woods Walks in accordance with policy 5 of the Acle Neighbourhood Plan.	<p>The walking distance between the centre of North Burlingham and the centre of Acle is approximately 3.8km. The Institution of Highways and Transportation (IHT) document, 'Providing for Journeys on Foot (2000)', indicates that the preferred maximum walking distance to common facilities is 1.2km and up to 2km for commuting, or walking to school. The walking distances to the facilities at Acle exceed the preferred maximum walking distances. The IHT document identifies 1.4m/s as an average walking speed on an asphalt surface, giving a walking time of 46 minutes. Walking trips between North Burlingham and Acle are therefore more likely to comprise recreational walking trips than utility trips.</p> <p>An attractive walking route for recreational walking trips between North Burlingham and Acle is already provided by way of the Burlingham Woodland Walks network, utilising sections of Burlingham FP1 and FP2,</p>

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		<p>South Walsham FP12, the permissive footpath between South Walsham Road and The Windle and the Byway between The Windle and Mill Lane in Acle. Therefore, given the existing walking route, there is no requirement for an additional walking route along the A47 between South Walsham Road and The Windle.</p> <p>The WCH surveys conducted at the A47 / South Walsham Road / B1140 junction recorded a negligible number of cyclists traveling east to west (and vice versa) on the A47. A small volume of cyclists were however, recorded crossing between the B1140 and South Walsham Road. These results confirm that the existing A47 is not an attractive route for cyclists.</p> <p>With the Scheme in place, cyclists wishing to travel between North Burlingham and Acle will have a choice of routes. On leaving North Burlingham, they can travel north along South Walsham Road to Green Lane, northeast along Green Lane to Acle Road and then follow Acle Road/South Walsham Road into Acle. Alternatively, cyclists can leave Acle Road at The Windle and travel south before following the Byway which provides access to Mill Lane in the centre of Acle. Both routes are attractive and conducive to cycling. For cyclists not using road bikes, use can also be made of bridleway South Walsham BR11, which would result in a shorter journey than using Green Lane. Therefore, given the choice of existing cycling routes, there is no requirement for an additional cycling route along the A47 between South Walsham Road and The Windle.</p>
36	<p><u>Consideration of the draft order</u></p> <p>With regards to the Draft Development Consent Order, the Council in general terms does not wish to raise any concerns, however the Council wishes to reserve its position at this stage pending further progress of the examination and discussions with the Applicant.</p>	<p>The Applicant acknowledges this comment and will continue to liaise with Broadlands District Council with respect to the draft DCO.</p>

APPENDIX 1 – RESPONSE TO LOCAL IMPACT REPORT APPENDIX 1

Document	Policy	Local Impact Report	Applicant's Response
Joint Core Strategy for Broadland, Norwich and South Norfolk (2011), Amendments adopted 2014.	Policy 1 – Addressing climate change and protecting environmental assets	Policy 1 covers a broad spectrum off issues relating to climate change and environmental assets. Overall compliance with this policy will need to be undertaken through the examination process but the Council raise no in principle issues in respect of compliance with it.	The Applicant acknowledges this comment.
	Policy 2 – Promoting good design	The design, siting and use materials of the Scheme is intrinsically related to its function and design opportunities are considered limited. However it is noted that landscaping is used as mitigation to soften some of the impacts of the development (for example on landscape or the setting of heritage assets) and the route of the scheme has had regard to local constraints to try and minimise these impacts. Consequently it is considered that there is no conflict with Policy 2. In response to ExA Questions 1.10.8 Broadland District Council would welcome a requirement within the dDCO for the detailed design of the proposed bridges to be undertaken in consultation with BDC and / or subject to design review by Highway England's Strategic Design Panel.	<p>The Applicant made the following response to the ExA FWQ 1.10.8 (REP1-061)</p> <p><i>Requirement 3 in the draft DCO (TR010040/APP/3.1 Rev 1) 'Detailed design' sets out that the authorised development must be designed in detail and carried out so that it is compatible with the preliminary scheme design shown on the works plans and engineering drawings and sections unless otherwise agreed in writing by the Secretary of State, following consultation with the relevant planning authority on matters related to its functions.</i></p> <p><i>Should the design of the structures change from that shown the Applicant would have to consult with Broadland District Council.</i></p> <p><i>Highways England's Strategic Design Panel was set up in 2017 and is intended to focus on strategic input rather than scheme specific details targeting where its expertise, insight and guidance will have most positive impact and wider benefit, such as standards, procurement and evaluation. As such, the Strategic Design Panel is not of direct applicability to the Scheme.</i></p>

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	Policy 5 – The economy	The Scheme, for reasons set out in the Local Impact Report, is considered to result in economic benefits. It is considered that the scheme complies with policy 5.	The Applicant acknowledges this comment.
	Policy 6 – Access and transportation	Policy 6 includes reference to the promotion of improvements to the A47. The supporting text identifies that these improvements relate more specifically to improvements to reduce the significant stretches that remain single carriageway. The scheme is considered to comply with this policy 6 in principle.	The Applicant acknowledges this comment
	Policy 7 – Supporting communities	Policy 7 seeks to enhance quality of life and well being of communities. Included within this is the promotion of healthier lifestyles by maximising access by walking and cycling and providing opportunities for social interaction and greater access to green space and the countryside. As detailed within the LIR, the scheme severs Burlingham FP3 and the proposed solution results in a significant detour. This could be mitigated through the provision of a footbridge at FP3 over the proposed route of the A47. Whilst the scheme therefore provides access to local green infrastructure networks, this could be better maximised (in accordance with policy 7) through the inclusion of a footbridge.	<p>The Applicant acknowledges this comment.</p> <p>The Applicant made the following response to the ExA FWQ 1.13.8 (REP1-061).</p> <p><i>(c) Firstly, Burlingham FP3 is a public footpath so cannot be used legally by cyclists, i.e. all existing cycle trips are required to make use of the local highways connecting to the A47 and cross the A47 at the existing at-grade junctions. For cyclists to use Burlingham FP3, its status would need to be legally changed to that of either a bridleway or cycle track, its width would need to be increased and its surfacing improved in agreement with the relevant landowner(s). Upgrading the status and form of this PRow would extend the impacts on landowners and could not be justified in terms of being sufficiently compelling when considering whether or not to compulsory acquisition powers should be sought.</i></p> <p><i>As indicated, all existing cycle trips between Lingwood and North Burlingham and between other destinations north and south of the A47 are required to make use of the local highways connecting to the A47 and cross the A47 at the existing at-grade junctions. The Proposed</i></p>

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			<p><i>Scheme would not lead to a marked increase in journey distance for cycling trips across the A47 and the cycle track to be incorporated into the proposed North Burlingham Junction would facilitate the safe crossing of the new A47. The proposed Scheme would therefore improve the cycling experience and remove the severance effect of the A47 for cyclists. With the provision of the two new bridges as part of the Scheme it was considered appropriate to utilise these crossings for pedestrians and cyclists in addition, with the two crossing being sufficiently proximate to the currently location of Burlingham FP3 so as not to justify in highway and economic terms the provision of an additional crossing solely for pedestrians.</i></p> <p><i>The WCH surveys recorded very low usage of Burlingham FP3 and very few crossing movements of the A47 in the vicinity of North Burlingham, reference to ES Chapter 12: Population and Human Health [APP-050] Table 12.5. It may be that Burlingham FP3 is not an attractive route for walking trips between North Burlingham and Lingwood, for utility trips, given that it is an unsurfaced, part field edge/part field footpath and given the distance between the two settlements.</i></p> <p><i>The walking distance between the centre of North Burlingham and both the primary school and village hall at Lingwood, via Burlingham FP3 and the footways provided as part of the local highways, is approximately 2.5km. The walking distance to the railway station is 2.3km via the same route. The Institution of Highways and Transportation (IHT) document, 'Providing for Journeys on Foot (2000)', indicates that the preferred maximum walking distance to common facilities is 1.2km and up to 2km for commuting, or walking to school. The walking distances to the facilities at Lingwood exceed the preferred maximum walking</i></p>

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			<p><i>distances. Moreover, to put the required walking times into perspective, the IHT document identifies 1.4m/s as an average walking speed. The application of this walking speed indicates a walking time of around 30 minutes to reach the primary school and villages hall and 28 minutes to reach the railway station, irrespective of any delay associated with crossing the A47. These sizeable walking distances and walking times suggest that despite the apparent severance effect of the A47, use of Burlingham FP3 is not an attractive route for everyday utility trips between North Burlingham and Lingwood. This is likely to remain the case if an overbridge were to be provided.</i></p> <p><i>It can be concluded from the above that Burlingham FP3 is therefore more of a leisure route for recreational walking trips where surface quality and walking distance are less important. Many of the RRs highlight the importance of this route for leisure purposes.</i></p> <p><i>Looking now at the issue of access to the Burlingham Woodland Walks network at North Burlingham, namely where Burlingham FP1 connects with Main Road, having commenced such a recreational walking trip at Lingwood railway station. The walking distance via Burlingham FP3 and the footways provided as part of the local highways is around 2.1km, which suggests a walking time of around 25 minutes plus any delay associated with crossing the A47. With the Scheme implemented as proposed, three alternative routes for walkers are available between Lingwood Station and Burlingham FP1. These are shown in Applicant's Response to Relevant Representations, Appendix A, Figure C (REP1-060) and described below: -</i></p> <ul style="list-style-type: none"> <i>Option 1 - via use of the local highways (School Road/Church Road), Burlingham FP3, the</i>

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			<p><i>proposed new P_{Ro}W footpath to the south of the A47, the shared footway/cycleway at the North Burlingham junction to cross the A47 and then the footways along Main Road to access Burlingham FP1. This results in an increased walking distance of around 2.2km and an increased walking time of around 26 minutes. .</i></p> <ul style="list-style-type: none"> • <i>Option 2 - via use of the local highways (School Road/Church Road), Burlingham FP3, the permissive bridleway to Lingwood Lane, Lingwood Lane, the proposed new P_{Ro}W footpath to the south of the A47 and then via the same route to Option 1 to access Burlingham FP1. This results in an increased walking distance of around 2.1km and an increased walking time of around 25 minutes.</i> • <i>Option 3 - via use of the local highways (School Road/Lodge Road), Lingwood Lane, the proposed new P_{Ro}W footpath to the south of the A47 and then via the same route as Options 1 and 2 to access Burlingham FP1. This results in an increased walking distance of around 1.5km and an increased walking time of around 18 minutes.</i> <p><i>The above indicates that users undertaking a recreational walking trip would experience around an 18 to 26 minute increase in walking time when accessing Burlingham FP1 from Lingwood railway station, although, minimal delays would be experienced when crossing the new A47 via the proposed North Burlingham Junction. Given that this grade separated junction would remove the severance effect of the A47, it is contended that the increased walking distances are unlikely to be a deterrent to those users wishing to undertake a purely recreational trip. In summary, given the sizeable walking distances and walking times</i></p>

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			<p><i>involved and the fact that part of the route is via an unsurfaced, part field edge/part field footpath, it is concluded that Burlingham FP3 is not an attractive route for everyday utility trips between North Burlingham and Lingwood. This would continue to be the case if an overbridge of the A47 at North Burlingham were to be provided. Therefore, it is unlikely that provision of an overbridge would lead to a significant increase in utility walking trips between Lingwood and North Burlingham, as is claimed by the RRs.</i></p> <p><i>It is acknowledged that, with the Scheme implemented as proposed, users undertaking recreational walking trips would experience increases in walking time and walking distance when accessing the Burlingham Woodlands Walks network from Lingwood railway station. However, given that the proposed North Burlingham junction would remove the severance effect of the A47, it is contended that the increased walking distances are unlikely to be a deterrent to recreational users. If anything, recreational walking trips could increase given that the A47 would no longer be a barrier.</i></p> <p><i>An additional overbridge at North Burlingham for pedestrians and cyclist is therefore not included in the Scheme as it could not be justified in terms of compelling case of land acquisition and the costs of constructing and maintaining the bridge for very limited use, when two bridges providing the facility to cross the A47 are being provided.</i></p>

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Broadland Development Management DPD 2015	Policy GC1 – Presumption in favour of sustainable development	This policy reflects the presumption in favour of sustainable development of the NPPF. The precise application of this policy is to be undertaken when consideration of compliance or otherwise with the development plan and material considerations have been assessed through the examination process.	The Applicant acknowledges this comment.
	Policy GC2 – Location of new development	The scheme is outside of the settlement limit defined on the policies map. Policy GC2 states that outside of settlement limits development which does not result in any significant adverse impact will be permitted where it accords with a specific allocation and/or policy of the development plan. In this respect, policy 6 of the JCS, which seeks to promote improvements to the A47 to reduce the significant stretches that remain single carriageway, is of particular relevance. The Council therefore considers that the scheme complies with policy GC2 subject to the examination process finding no significant adverse impact	The Applicant acknowledges this comment.
	Policy GC4 – Design	<p>Policy GC4 covers a broad range of issues that proposals should pay adequate regard to. The Council has the following observations using the numbering of policy GC4:</p> <ul style="list-style-type: none"> i) Whilst the scheme will impact on the environment, character and appearance of the area, the route of the scheme has been designed to reduce these and where adverse impacts would result mitigation in the form of landscaping is proposed to avoid significant impacts. ii) Given the nature of the scheme it is difficult to reinforce local distinctiveness, however the comments made under (i) are considered relevant here. iii) N/A 	<p>The Applicant acknowledges this comment.</p> <p>With respect to point viii the Applicant has provided a response in Appendix A to Applicant's Response to Relevant Representations (REP1-060).</p> <p>With respect to point x the Applicant has submitted a revised version of ES Chapter 14 Climate (REP2-002) and a response to the Examining Authority's Rule 17 Request (REP2-009)</p>

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		iv) The application has considered the impact of development on amenity of existing residents and mitigation will be secured to avoid significant adverse impacts. v) The Council consider that the scheme utilises the site area effectively. vi) The Council note that provision is made for a range of transport modes including enhanced pedestrian and cycle routes. vii) The Council raise no issue in respect of the safety of the environment and crime prevention. viii) The Project provides links into existing infrastructure, however the severance of Burlingham FP3 could be mitigated through the provision of a footbridge rather than the proposed detour to the eastern end of the scheme. ix) N/A x) The Council note that the ExA has requested further work on climate change is undertaken as part of the ES.	
	Policy EN1 – Biodiversity and habitats	Whilst the scheme will have impacts on biodiversity and habitats, the route of the scheme has had regard to constraints and mitigation for adverse impacts can be secured. In addition, the Council consider that there are clear benefits of the scheme which weigh in favour of the scheme in the application of this policy.	The Applicant acknowledges this comment.

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	Policy EN2 – Landscape	Whilst the project will have adverse impact on the character and appearance of the area through the urbanisation of existing countryside, these impacts can be reduced through mitigation in the form of new landscaping. Subject to a suitable mitigation scheme (and no objections are raised in principle to what is being proposed in this respect) and its long term management and maintenance, the Council consider that the scheme would comply with EN2 in the context of this as a nationally significant infrastructure project.	The Applicant acknowledges this comment.
	Policy EN4 – Pollution	The Council raise no issues in principle in respect of this policy subject to suitable mitigation being secured in the DCO to ensure that there is no significant impact upon amenity, human health or the natural environment	<p>The Applicant acknowledges this comment.</p> <p>Mitigation measures are set out within the Register of Environmental Actions and Commitments which forms part of the Environmental Management Plan (TR010040/APP/7.7 Rev 3) submitted at Deadline 3.</p> <p>The EMP and the measures within it are secured by Requirement 4 to the Draft DCO (TR010040/APP/3.1 Rev 2) submitted at Deadline3.</p>
	Policy TS2 – Travel plans and transport assessments	The Council raise no issues in respect of this policy subject to Norfolk County Council (as local highway authority) being satisfied through the examination process.	The Applicant acknowledges this comment and will continue to liaise with Norfolk County Council.
	Policy TS3 – Highway safety	The Council raise no issues in respect of this policy subject to Norfolk County Council (as local highway authority) being satisfied through the examination process	The Applicant acknowledges this comment and will continue to liaise with Norfolk County Council.

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	Policy CSU5 – Surface water drainage	The Council raise no issues in respect of this policy subject to the lead local flood authority being satisfied through the examination process.	The Applicant acknowledges this comment and will continue to liaise with Norfolk County Council.
Broadland District Council Site Allocations DPD 2016	No relevant policies	N/A	
Broadland District Council Growth Triangle Area Action Plan 2016	No relevant policies	N/A	
Acle Neighbourhood Plan	Policy 5 – Improving links to the countryside and surrounding villages	The policy seeks to improve pedestrian links to the countryside and surrounding villages. Broadland District Council has also previously made comments about the potential for the inclusion of cycling and pedestrian routes between North Burlingham and Acle. Whilst it is noted that Highways England have identified that these are outside of the scope of the scheme, Broadland District Council would wish to reiterate that their inclusion would be welcomed on the basis that it would create sustainable access for those in North Burlingham to a greater range of shops and services in Acle and provide enhanced access for residents in the locality to access Burlingham Woods Walks in accordance with policy 5 of the Neighbourhood Plan	The Applicant acknowledges this comment. The Applicant has previously provided a response in Appendix A to Applicant's Response to Relevant Representations (REP1-060).
Blofield Neighbourhood Plan	No relevant policies	N/A	